

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

-VS-

ALLAN ROSS

**FILED**

**WILKES BARRE**

OCT - 9 2007

**CRIMINAL COMPLAINT**

MARY E. D'ANDREA, CLERK

CASE NUMBER: 5:MJ-07-119

Per

I, the undersigned complainant being duly sworn, depose that the following is true and correct to the best of my knowledge and belief:

**Count 1:** From in or about May 2007 through on or about October 8, 2007, in Lackawanna and Northumberland Counties, in the Middle District of Pennsylvania, the defendant, Allan Ross, used a facility and means of interstate and foreign commerce, to knowingly attempt to persuade, entice, and induce any individual who has not attained the age of 18 years, for the purpose of engaging in sexual acts as defined in Title 18, United States Code, Section 2246, and the sexual acts would be a violation of chapter 109A of Title 18, to wit, Title 18, United States Code, Section 2243(a), if the sexual acts occurred in the special maritime and territorial jurisdiction of the United States, in violation of Title 18, United States Code, Section 2422(b).

I further state that I am a Task Force Officer with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

**SEE ATTACHED AFFIDAVIT**

Continued on the attached sheet and made a part hereof. ☒ Yes ☐ No

Tfo Jennifer Walsh  
Signature of Complainant

Sworn to before me, and subscribed in my presence

10/9/07 at  
Date

Wilkes-Barre, Pennsylvania  
City and State

Malachy E. Mannion, U.S. Magistrate Judge  
Name and Title of Judicial Officer

[Signature]  
Signature of Judicial Officer